SEALED

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

CLERK'S OFFICE U.S. DIST. COURT AT CHARLOTTESVILE, VA FILED

JUN 1 1 2018

JULIA C: DUDLEY, CLERK
BY: DEPUTY CLERK

IN THE MATTER OF THE SEARCH OF THE PREMISES OF 248 BANNER STREET, DANVILLE, VIRGINIA 24541 Case No. 4:18-mj-00075

Filed Under Seal

## **MOTION TO SEAL**

Comes now the United States of America through its attorney and respectfully moves this Court for an order sealing the corresponding Search Warrant, Application for Search Warrant, supporting Affidavit and Attachments, Inventory Return, this Motion to Seal, the Order to Seal, the Motion for Non-Disclosure of Legal Process, and the Order for Non-Disclosure of Legal Process. As grounds for this Motion, the United States asserts the following:

- 1. The United States is currently conducting a large, multi-agency investigation into violent crime in the Danville, Virginia area. The above-referenced materials are part of that investigation. This case involves allegations of violent conduct by gang members, including murder. Some of the allegations in this investigation also include potential witness intimidation and obstruction of justice.
- 2. Disclosure of these materials could significantly harm the current investigation. The United States in good faith believes that disclosure of these materials could alert suspects, accomplices, and/or witnesses to the ongoing federal investigation, which would result in the potential flight of targets and subjects, the destruction of evidence, and witness tampering, intimidation, and/or and harm.

3. Therefore, the United States respectfully requests that these materials be placed under seal for a period of 30 days, or until further order of this Court, to give the United States sufficient time to receive, review, and process the warrant return materials.

Respectfully submitted,

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